

EXHIBIT C

Firestone, Michael

From: Firestone, Michael
Sent: Friday, April 08, 2011 4:43 PM
To: 'Schwartz, Matthew A.'
Cc: Clark, Bruce E.; Slack, Richard
Subject: RE: 2004 Discovery Requests

Matthew,

Thank you for providing us with an advance draft of Giants Stadium's Rule 2004 motion. The motion is inappropriate for number of reasons. As you know, the debtor has served 2004 discovery on Giants Stadium pursuant to the Court's November 23, 2009 order authorizing the debtor to take this discovery. This 2004 discovery has included document requests and the deposition of Giants Stadium's CFO (which is set for early May). The purpose of this discovery is for the debtor to determine if there is a dispute concerning the swaps between Giants Stadium and Lehman and, if so, what are the issues. We recognize that Giants Stadium has already filed a proof of claim in the Bankruptcy Court with respect to these swaps. We are still engaged in our investigative process. At the conclusion of that process, we could agree with Giants Stadium's views of the swap as set forth in the proof of claim or we could determine that there are issues that the parties need to resolve. Those disputes will be the subject of either a claims process or an adversary proceeding in the Bankruptcy Court. In either case, Giants Stadium will have ample opportunity, if the need arises, to take discovery at that time in the context of such proceedings. We look forward to completing our investigation and working with you on the next steps.

Regards,

Michael



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From: Schwartz, Matthew A. [<mailto:schwartzmatthew@sullcrom.com>]
Sent: Wednesday, April 06, 2011 11:49 AM
To: Slack, Richard; Firestone, Michael
Cc: Clark, Bruce E.
Subject: 2004 Discovery Requests

Dear Richard and Michael,

Attached are draft papers that Giants Stadium intends to submit to the Court seeking 2004 discovery from the Debtors. Before filing these papers, we would like to give you the opportunity to review them to see if you would consent to the motion, or agree not to oppose. We'd appreciate any response by end of this week.

Regards,

Matthew

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